

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

Phillip Lawson, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	Case No. 3:24-cv-00538
v.)	
)	Chief Judge William J. Campbell, Jr.
Tre Hargett, in his official capacity as)	Magistrate Judge Alistair Newbern
Tennessee Secretary of State, <i>et al.</i>)	
)	
<i>Defendants.</i>)	

**SUPPLEMENTAL DECLARATION OF DEBBY GOULD ON BEHALF OF THE
LEAGUE OF WOMEN VOTERS OF TENNESSEE**

Pursuant to 28 U.S.C. § 1746, I, Debby Gould, declare as follows:

1. I am over the age of 18, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.
2. The League of Women Voters of Tennessee (“LWVTN” or “the League”) is a plaintiff in the above captioned case.
3. I am the president of LWVTN. In my capacity as president of LWVTN, I am familiar with the activities of LWVTN and receive frequent updates regarding the activities of each of Tennessee’s local Leagues. I am also in direct communication with many individual League members and voters.
4. After the March 5th primary, I spoke with an LWVTN member named Kären Wieckert who has served for a number of years as a poll worker. She expressed to me that her inability to explain or respond to questions about the requirements of Section 115 or the

language in the sign required by Section 115(c) to voters effectively prevented her from fully performing her duties as a poll worker. As a result, she is hesitant to continue in this capacity. This, of course, affected Ms. Wieckert personally and impaired the mission of LWVTN more broadly. Additionally, she has concerns that she might be asked to confirm information that an individual voter might share with her who is challenged later under Section 115. Ms. Wieckert is reluctant to be in a position where she might be asked to disenfranchise a voter.

5. As mentioned in my prior Declaration, both before and after the March 5th primary, I received many communications from other LWVTN members and poll observers related to confusion around Sections 115(b) and (c) and frustration about how the law is deterring Tennesseans from voting.
6. On May 3, 2024, I received, unsolicited, the email attached as **Exhibit A** from Cynthia Arnold. Ms. Arnold, a Knoxville, TN voter, describes exactly the confusion, fear of prosecution, and intimidation that many Tennessee voters and League members are experiencing. In that email, she states as follows:

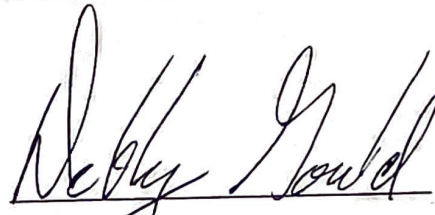
In the last primary election in Knoxville, Tennessee, I did not vote in the Republican primary because I was afraid and confused. Instead I voted in the Democratic primary although I was still unsure if I'd broken the law. I've never registered in any party, and have no idea how to prove my "bona fides". Also, I thought Tennessee was an open primary state, and the new law seems to contradict that.

I don't know if my experience will add weight to the lawsuit or not, but the new law kept me from voting in the primary of my choice.

Ex. A (emphasis added).

7. As of today, the League has already spent \$8,406.95 of the budgeted items described in my prior Declaration connected directly to Sections 115(b) and (c).
8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2024



Debby Gould

Debby Gould <debbygould@[REDACTED]>
Reply-To: Debby Gould <debbygould@[REDACTED]>
To: "lwvtenn@gmail.com" <lwvtenn@gmail.com>, Cynthia Arnold <cynthia.arnold@[REDACTED]>
Cc: Debby Gould <debbygould@[REDACTED]>

Fri, May 3, 2024 at 10:53 AM

Cynthia,

Thanks for reaching out. Yes, the League of Women Voters agrees with you that the new law seems to contradict the concept of an open primary state and creates an impossible standard for voters. I appreciate hearing from you. We certainly hope for a positive resolution for voters before the August 1 primary.

Debby Gould, President
League of Women Voters of Tennessee

On Friday, May 3, 2024 at 05:39:17 AM CDT, Cynthia Arnold <cynthia.arnold@[REDACTED]> wrote:

To whom it may concern,

In the last primary election in Knoxville, Tennessee, I did not vote in the Republican primary because I was afraid and confused. Instead I voted in the Democratic primary although I was still unsure if I'd broken the law. I've never registered in any party, and have no idea how to prove my "bona fides". Also, I thought Tennessee was an open primary state, and the new law seems to contradict that.

I don't know if my experience will add weight to the lawsuit or not, but the new law kept me from voting in the primary of my choice.

Cynthia Arnold